

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**VERONICA STANLEY,  
on behalf of minor child, LB,**

**PLAINTIFF,**

**VS.**

**BULLOCK COUNTY BOE;  
BULLOCK COUNTY SCHOOL  
BOARD; BULLOCK COUNTY  
SCHOOL DISTRICT; and  
ROBERT MCDUFFIE, in his  
individual and official capacities,**

**DEFENDANTS.**

**CASE NO: 2:07-CV-681**

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Rule 26(f) Federal Rules of Civil Procedure, the parties conducted a planning meeting on January 8, 2008, via telephone conference attended by:

Kathryn Dickey for plaintiff Veronica Stanley, and

Clay R. Carr for defendants Bullock County Board of Education and Robert McDuffie.

2. **Pre-Discovery Disclosures.** The parties will exchange by January 22,

2008, the information required by Rule 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

For the defendants: Details of the incident alleged by the plaintiffs; the injuries, treatment and damages alleged to have resulted; and the minor plaintiff's current condition with respect to the alleged incident and injuries.

For the plaintiffs: Policies and procedures used by Bullock County Board of Education and Robert McDuffie; detail of actions taken by Bullock County Board of Education and Robert McDuffie prior to and following the incident; detail of responses to allegations in complaint.

All discovery should be commenced in time to be completed by November 1, 2008.

A maximum of thirty (30) interrogatories to be allowed by each party to any other party with responses due within thirty (30) days after receipt.

A maximum of fifteen (15) requests for admission to be allowed by each party to any other party with responses due within thirty (30) days after receipt.

A maximum of thirty (30) requests for production to be allowed by each party to any other party with responses due within thirty (30) days after receipt.

A maximum of ten (10) depositions to be allowed by the plaintiff and ten (10) depositions by the defendants.

Depositions shall be limited to eight (8) hours per witness except by agreement.

Reports from retained experts under Rule 26(a)(2) due:

from the plaintiffs by August 15, 2008;  
from the defendants by September 15, 2008.

Supplementations under Rule 26(e) due September 24, 2008.

**4. Other Items.**

The parties do not request a conference with the Court before entry of the scheduling order.

Plaintiffs should be allowed until March 30, 2008, to join additional parties and to amend the pleadings.

Defendants should be allowed until April 30, 2008, to join additional parties and to amend the pleadings.

All potentially dispositive motions should be filed by November 18, 2008.

Settlement is unlikely, but cannot be fully evaluated until after completion of the depositions of the parties.

The parties request a final pretrial conference in February 2009.

Final lists of trial evidence under Rule 26(a)(3) should be due:

From plaintiffs: witnesses and exhibits by January 15, 2009;

From defendants: witnesses and exhibits by January 30, 2009;

Parties should have ten (10) days after service of final lists of trial evidence to list objections under Rule 26(a)(3).

The case should be ready for trial by the Court's civil trial term scheduled for March 16, 2009, and at this time is expected to take approximately two to three days.

/s/ Kathryn Dickey

Kathryn Dickey  
Attorney for Plaintiffs  
Law Offices of Kathryn Dickey  
322 Alabama Street, Suite B  
Montgomery, Alabama 36104

/s/ Clay R. Carr

Clay R. Carr  
Attorney for Defendants  
Bullock County Board of Education  
Robert McDuffie  
Boardman, Carr, Hutcheson & Bennett, P.C.  
400 Boardman Drive  
Chelsea, Alabama 35043

DATE: January 8, 2008

[illegible]

Discover will be needed on the following subjects:

~~Kathryn Reed, Plaintiff Details of the incident alleged by the plaintiffs; the injuries, treatment and damages alleged to have resulted; and the minor plaintiff's current medical condition. Plaintiff Plaintiff and Defendant Defendant, filed suit before the court.~~

**BULLOCK COUNTY SCHOOL**

~~Individuals who wish to request a public hearing should contact the Clerk of the Board at [redacted] or by email at [redacted].~~

Robert A. Maximum of thirty (30) interrogatories to be allowed by each party to Board South Coast Healthplan & Partners, fully (100) days after the completion of the depositions. Federal Rules of Civil Procedure, the parties' Court-ordered Discovery Plan (the "Plan") and the Court's Order to Compel Discovery. The parties request an extension of time to be allowed to file the answers to the interrogatories requested in the Plan. The parties request a final meeting on or before March 1, 2009, as attended by the Board and the parties' counsel, to be held in the presence of the Board's counsel.

by: Final lists of trial evidence under Rule 26(a)(3) should be due:

A maximum of thirty (30) requests for production to be allowed by each  
 DATE: 1-11-2009 10:09 AM. The system may only be used to request production of documents from a company  
 receipt 2009;

A max From deffendant's deposition and exhibits by January 20, 1997 and, and no other evidence presented by the defendant and the plaintiff and the plaintiff's attorney, of the McDuffie, 10 depositions by the defendants.

For purposes of our disclosure, we have not identified the specific individuals or entities that have been the subject of the disclosure. The disclosure is made for the purpose of providing information to the public and is not intended to be used for any other purpose. The disclosure is made for the purpose of providing information to the public and is not intended to be used for any other purpose. The disclosure is made for the purpose of providing information to the public and is not intended to be used for any other purpose.